

CORRESPONDENCE
OUTGOING LTR NO.

DOE ORDER# 4700.1

94RF09176

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.

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LEDGER, A. X

MELLEN, J. X

WRAPP, M. X

FZLE, X

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PATS/T130G		

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IN REPLY TO RFP CC NO:

ACTION ITEM STATUS

☐ PARTIAL/OPEN☐ CLOSED

LTR APPROVALS:

ORIG & TYPIST INITIALS

September 1, 1994

94-RF-09176

F. R. Lockhart
Environmental Restoration Division
DOE, RFFO

REVISED INTERAGENCY AGREEMENT (IAG) MILESTONES FOR OU 4 PHASE I -
SRK-188-94

Action: None Required

Solar Pond Projects (SPP) has begun preparing new commitment milestone dates for OU 4 Phase I, and there is a potential schedule slip of at least three months in the start of OU 4 Phase I construction arising from regulator reviews of OU 4 documentation. We recommend against applying schedule reserve to this potential delay. This letter documents our analysis.

Colorado Department Public Health and Environment (CDPHE) representative Harlen Ainscough provided the following informal information that varies from the existing streamlined review schedule:

- The State will need to complete review of the Final Decision Document prior to beginning review of the Title II design package, and
- The State will need the review durations from the original IAG schedule for the Responsiveness Summary, the Final Decision Document, and the Title II package.

Although the CDPHE information was offered informally, we have evaluated the potential impacts. Based on our experience with the regulator review of the Draft Decision Document and Draft Phase II Work Plan, the streamlined approach has failed and future reviews may also fail to follow the streamlined schedule.

Returning to the original IAG review durations adds about eleven days to each regulator review period, and the logic change creates serial rather than parallel reviews. We calculated IAG milestone dates with this CDPHE information and obtained a Start Of Construction date of January 5, 1996. Such a delay solely for administrative purposes is highly unpalatable.

We have analyzed the schedule to determine if the changes could be reasonably accommodated with schedule reserve:

- Nineteen days of reserve are attached to submittal of the Responsiveness Summary. This reserve is intended to support response to the public and preparation of the Summary. Given the potential for public controversy, planning to shift this reserve into the regulator review of the Summary seems imprudent.

ADMIN RECORD

- No schedule reserve is attached to the submittal of the Final Decision Document, as the streamlined approach assumed all substantive review would be completed before this deliverable.
- Twenty two days of schedule reserve are attached to submittal of the Title II design package. Although this reserve is intended to support preparation of the design, perhaps some could be held for the regulators' use.
- Twenty four days of schedule reserve are attached to Start Of Construction. Some of this reserve might be applied to the Title II review delay, but most should be held for other schedule risks.

Even with the use of reserve for regulator review as discussed above, the Start Of Construction would slip into December, 1995. We recommend against giving up reserve at this time: loss of reserve would decrease our ability to deal with other problems during the project; does not recover the delay; and does not address the underlying problem of slow reviews.

We are proceeding with calculation of new IAG milestone dates incorporating the informal CDPHE suggestions since they appear to be accurate assessments of the regulator's capabilities to support the Solar Ponds closure. We will also introduce an additional block of schedule reserve based on the Draft Decision Document review experience, which included a forty-three day extension. Inclusion of these changes should assist us in focusing the Joint Working Group on the impact of extended review periods and provide a realistic projection of performance if reviews cannot be streamlined.

For further discussion, please contact Andy Ledford, extension 8673.



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